

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

Case No. 03-C-1427

v.

HEARTLAND ADVISORS, INC., et al.,

Defendants.

**MOTION FOR PARTIAL RECONSIDERATION OF
MARCH 31, 2011 SUMMARY JUDGMENT ORDER**

Defendant Jilaine Bauer, by her attorneys, Reinhart Boerner Van Deuren s.c., moves for partial reconsideration of the Court's March 31, 2011 order insofar as it granted in part Plaintiff Securities and Exchange Commission's cross-motion for summary judgment and found "that Bauer possessed material, nonpublic information, and therefore, engaged in insider trading when she redeemed her shares of Heartland's Short Duration High Yield Municipal Fund ['the Fund'] on October 3, 2000."

The grounds for this motion, as set forth in the attached supporting brief are that there exist genuine issues of material fact with respect to required elements of the SEC's insider trading claim.

In connection with the motion, defendant requests that the court:

(1) Enter an order vacating the March 31, 2011 order insofar as it granted in part the SEC's cross-motion for summary judgment and found that Bauer engaged in insider trading;

(2) Enter an order denying the SEC's cross-motion for summary judgment in its entirety; and

(3) Any further relief that the Court deems just and equitable.

Dated this 20th day of April, 2011.

s/ Ryan S. Stippich

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